

## GDPR and Data Protection Compliance Statement

This document sets out how we protect the Personal Data (as defined below) that we process when we supply services to our customers. This document also sets out the standards we expect from our suppliers who may also access Personal Data. "Personal Data" has the meaning as set out in the Legislation but put simply, it means any data that identifies a person (e.g. name, address, email address, mobile number).

We take the privacy of the Personal Data which we handle very seriously.

1. Ton Tyre Auto Limited ('TTA', 'we', 'our' or 'us') are a 'Data Processor' for the purposes of the Data Protection Act 1998 and as of 25 May 2018, the General Data Protection Regulation ('GDPR') (as applicable the "Legislation"). We will take all appropriate steps to ensure compliance with the Legislation.
2. Most of the information we keep, is provided by our customer. We only process the Personal Data which we need in order to provide our services. Details of the types of Personal Data which we and our Suppliers process are set out in **Appendix A**.
3. We only sub-contract our services to third party suppliers who contract in writing with us and agree to be bound by the terms of this statement. (In providing our services our suppliers are also 'Data Processors' as defined in the Legislation.)
4. In the provision of our services we process Personal Data on behalf of our customers and/or their Employees who are the 'Data Controllers' (as defined by the Legislation). We will only process Personal Data as stipulated in any agreement with our customers or further to our customers' written instructions. Our suppliers only process Personal Data in order for us to comply with legal and legislative regulations.
5. We keep all Personal Data confidential and secure and we have incorporated the necessary technical and organisational measures to safeguard any Personal Data processed by us, in accordance with the Legislation which includes the use of secure passwords, user access controls, encryption, technical security such as firewalls and physical security including alarms and CCTV. However, while we will use all reasonable efforts to safeguard your Personal Data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Personal Data that is transferred from you or to you (further to your instructions) via the internet.
6. We will report any breaches or potential breaches to our customers as soon as we become aware of them (in any event within 24 hours) and we will provide sufficient information as is required for our customers to decide on how to handle the breach and to report such a breach to the relevant supervisory authority, if necessary. If our Customer so requests we will ensure that any further processing ceases.
7. We will promptly inform our customers of any request made by a regulator or data subject and we will comply with such requests subject to the prior written approval of our customer (unless we are legally prevented from obtaining such approval) and the payment of our reasonable costs in so doing.
8. We may send Personal Data to our suppliers in order to provide the services to the Customer. If we need to send any Personal Data to any other third party then we will obtain our customer's prior written consent before doing so, unless we are required by law to take such an action, in which case we will promptly inform our customer as soon as we are permitted to do so.

Ton Tyre Auto Limited  
Unit 9  
Eldon Way,  
Paddock Wood,  
Kent,  
TN12 6BE  
Company Number: 00746893  
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9. We take reasonable steps to ensure the reliability and integrity of our employees or representatives who may have access to any Personal Data which they process on our behalf and we require such employees and representatives to undergo a reasonable level of training regarding the handling of Personal Data, appropriate to the type of Personal Data being processed and set out in our employee contracts our employees obligations regarding confidentiality and the processing of Personal Data.

Retention Periods: We store Personal Data on secure servers for differing periods depending on the type of Personal Data and in particular as follows:

- Customer contact data for 6 years from the date on which you cease to be a customer of ours
- Supplier contact data for 6 years from the end of our commercial relationship  
OR until the customer or supplier asks us to return or destroy it
- Personal Data supplied by a customer or on behalf of its employees in relation to the provision of services until:
  - o 6 years after the services have been; or
  - o the customer or the data subject asks us to destroy it

in each case unless the law requires us to store the data for a longer period. We carry out regular audits of any Personal Data we hold to ensure as far as possible that we do not hold any Personal Data that is no longer required.

11. We will only send Personal Data outside the EEA where this is required as part of the services and we have entered into a legal agreement with such supplier (who is outside the EEA) in accordance with the Legislation. We will only do this where our customers expressly require us to do so and have confirmed this in writing.
12. Any questions about this statement or how we handle your Personal Data should be addressed to our data manager: Tim Kendrick at our registered office.

### Changes to this Compliance Statement

We may change this statement from time to time to comply with the Legislation In this event details will be published on the company website.

Signed by:

**Roy Edwards**

Managing Director

for and on behalf of **TON TYRE AUTO LIMITED**

## APPENDIX A

### **PART 1 - TYPES OF PERSONAL DATA**

Customer, rental users and supplier business contact details including names, email address, postal addresses and telephone numbers.

We do not process any sensitive (special category) Personal Data.

Both we and our suppliers will handle Customer and rental user contact details including email and postal addresses, telephone numbers and driving licence information of rental users.  
In addition broad details of some medical conditions is also retained for insurance purposes.

We have telematic devices fitted to our vehicles and information is retained regarding vehicle location during periods of hire.

We also operate CCTV systems at our premises.

### **PART 2 - PROCESSING ACTIVITIES THAT WE UNDERTAKE IN RELATION TO PERSONAL DATA**

We process Personal Data to:

- identify you and manage any accounts you hold with us;
- provide the services requested;
- detect and prevent fraud;
- notify you of any changes specific to your contract or any general updates regarding our business or changes in our processes or any legislation that may affect our services; and
- improve our services.